Mountain West Technologies
123 W 1st Street
Casper Wyoming

RE: Citizens Broadband Radio Service Docket No. 18-353

Commissioners:

Mountain West Technologies is a small broadband provider in central and southern Wyoming service with aproximatly 2000 rural customers. Our original deployment was in the 3650-3700 band offering speeds up to 7 meg down and 2 meg up. As demand increased and the technology improved we deployed equipment in other frequencies however we have a small number of customers that were only reachable in the 3650-3700 band. We researched and then deployed one CBRS upgradable location in anticipation that the CBRS band would be a good fit for further deployment.

As the rulemaking process has proceeded it became clear that it was impossible to make a firm business plan to deploy new equipment in the CBRS band until the rulemaking process was complete. There were just too many questions as to the availability of spectrum and the associated costs to be able to move forward. We have been forced to keep our old equipment in operation longer than we would have liked.

We are now in a situation that when the CBRS spectrum becomes available and the manufacturers are able to certify equipment for delivery we may only have a few months to deploy new equipment. In Wyoming the high winds make it difficult to predict when it will be safe to do equipment transitions. We are frequently limited to the months between May and August. The current deadline of April 2020 is effectively early September 2019 for those of us that are in the Rocky Mountains due to the weather in the Mountains.

We are facing the possibility that we will be forced to discontinue service to a small number of remote customers during the Winter of 2020 to remain in compliance with FCC regulations.

I ask the Commission to approve the extension requested in proceeding 18-353 to facilitate a more orderly transition of the 3650-3700 spectrum to the new CBRS bands.

Larry E. Ash
Network Engineering Director
Mountain West Technologies